

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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INEZ BETHEA, :  
: :  
Plaintiff, : No. 15-CV-3544 (PKC) (RML)  
: :  
- against - :  
: :  
JP MORGAN CHASE & CO, JP MORGAN :  
CHASE BANK NA, MANNY MAYSONET, :  
JOHN WOLF and COLLEEN M. CANNY, :  
: :  
Defendants. :  
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**NOTICE OF DEFENDANTS' APPLICATION  
FOR TAXATION OF COSTS**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Jade M. Gilstrap dated October 31, 2019 ("Gilstrap Declaration"); the Opinion and Order in favor of Defendants JPMorgan Chase & Co., JPMorgan Chase Bank, N.A. ("Bank"), John Wolf, and Colleen M. Canny (collectively, "Defendants") dated and entered on the docket on September 30, 2019 (ECF No. 80), annexed to the Gilstrap Declaration as Exhibit A; the Judgment in favor of Defendant, dated September 30, 2019 and entered on the docket on October 1, 2019 (ECF No. 81), annexed to the Gilstrap Declaration as Exhibit B; the Bill of Costs submitted by Seyfarth Shaw LLP, attorneys for Defendant, annexed to the Gilstrap Declaration as Exhibit C; the supporting documentation annexed to the Gilstrap Declaration as Exhibits D through E; and all papers and proceedings heretofore had herein, Defendants will move this Court before the Judgments and Orders Clerk, at the United States Courthouse for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, New York 11722, at a time and date to be determined by the Court, for an order pursuant to Rule 54 of the Federal Rules of Civil

Procedure, Local Civil Rule 54.1 and 28 U.S.C. §§ 1821, 1920 and 1923 granting to Defendants their taxable costs in the amount of \$4,807.50 and granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 54.1(b), objection in writing, if any, must be served prior to the date and time scheduled for the taxation.

Dated: New York, New York  
October 31, 2019

SEYFARTH SHAW LLP

By: /s/ Jade M. Gilstrap

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*Attorneys for Defendants JPMorgan Chase & Co.,  
JPMorgan Chase Bank, N.A., John Wolf and  
Colleen M. Canny*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2019, I electronically filed the foregoing Notice of Taxation of Costs and the Declaration of Jade M. Gilstrap, together with Exhibits A through E annexed thereto, with the Clerk of the Court via the Court's CM/ECF system, which sent notification of such filing to the following counsel of record for Plaintiff:

G. Wesley Simpson  
G. Wesley Simpson, P.C.  
1016 Ralph Avenue, 1st Floor  
Brooklyn, New York 11236  
(718) 345-8213

*/s/ Jade M. Gilstrap*  
Jade M. Gilstrap